



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DMP:ICR/JGH
F. #2016R00532

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 24, 2021

By ECF & Email

The Honorable Kiyo A. Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Sinmyah Amera Ceasar
Criminal Docket No. 17-48 (KAM)
Criminal Docket No. 19-117 (KAM)

Dear Judge Matsumoto:

The government respectfully submits this letter in advance of the status conference in the above-captioned matters currently scheduled for Tuesday, May 25, 2021 and to supplement the information provided by the Probation Department to the Court this morning regarding the defendant's conduct on supervised release since the prior status conference held by this Court on April 28, 2021.

Specifically, the government learned from the Probation Department on May 6, 2021, that Hope House, where the defendant has resided since August 2020, had terminated the defendant's residency at the facility because of her failure to comply with the facility's rules. Ceasar was discharged on May 7, 2021, and since then has been residing at a hotel in Manhattan. Since learning of the defendant's discharge, the government has sought to discern the underlying reasons for Hope House's decision.

On Thursday, May 20, 2021, the government received from Hope House's management a copy of a letter provided to the defendant on April 14, 2021 (the "April 14 Discharge Letter") informing the defendant that she would no longer be permitted to reside at Hope House as of April 16, 2021. The letter informed the defendant that she was being discharged from Hope House because of "several ongoing issues with behavior, non-compliance with Hope House policies, and perceived threats."

On Friday, May 21, 2021, the government spoke by telephone with the Hope House Program Manager who drafted the April 14, 2021 Discharge Letter. The Program Manager informed the government, *inter alia*, that Hope House staff delivered the letter to the defendant on April 14, 2021 and subsequently engaged in multiple communications with defense counsel and their staff on April 14, 15 and on several other occasions during which the Program Manager detailed the defendant's conduct that led to the decision to discharge her and sought to involve the Probation Department in seeking a new residence for the defendant. It is the government's understanding that none of this information, including Hope House's decision to discharge the defendant as outlined in the April 14 Discharge Letter, was shared with the Probation Department before May 6, 2021, when Hope House demanded that the defendant be discharged the next day following another incident involving the defendant and a member of Hope House's staff.

The government is troubled that none of this information was shared with the government, the Probation Department or the Court prior to Hope House contacting Probation directly on May 6, 2021, following the defendant's signing of a release permitting Hope House to share information with Probation. Notably, the last monthly status conference in this matter, which the Court has scheduled to discuss issues with the defendant's supervision like this one, was held on April 28 2021, two weeks after Hope House's management had already informed the defendant and her counsel that she was being discharged for violating Hope House's rules and engaging in threatening behavior. The defendant's persistent pattern of disobedience to authority is deeply concerning, as is counsel's failure to share information with the Court and the parties.

Respectfully submitted,

MARK J. LESKO
Acting United States Attorney

By: /s/ Josh Hafetz
Ian C. Richardson
Josh Hafetz
Assistant U.S. Attorneys
(718) 254-7000

cc: Clerk of Court (KAM) (by ECF)
Deirdre D. von Dornum, Esq. and Samuel Jacobson, Esq. (by Email and ECF)
Michael Imrek, Senior U.S. Probation Officer (by Email)